

**Robbins Geller
Rudman & Dowd LLP**

Boca Raton
Chicago
Manhattan

Melville
Nashville
Philadelphia

San Diego
San Francisco
Washington, D.C.

Alexandra S. Bernay
xanb@rgrdlaw.com

April 22, 2022

VIA ECF

The Honorable Magistrate Judge Edward S. Kiel
United States District Court
for the District of New Jersey
Frank R. Lautenberg U.S. Post Office
& Courthouse Building
2 Federal Square, Courtroom 8
Newark, NJ 07102

Re: *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London*,
No. 2:08-cv-00235-CCC-ESK

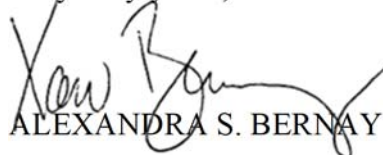
Dear Judge Kiel:

Through the meet and confer process, the parties have agreed, subject to Your Honor's approval, on the following proposed merits discovery schedule:

July 29, 2022	Deadline for the parties to agree on the selection of witnesses to be deposed.
August 12, 2022	Deadline for joint submission of any disputes concerning the selection of witnesses for depositions.
August 22, 2022	Deadline for joint submission of any replies concerning the selection of witnesses for depositions.
TBD by Court	Hearing on any disputes regarding the selection of witnesses for depositions.
January 20, 2023	End of fact discovery.

The Parties will be prepared to discuss the proposed fact discovery schedule at the upcoming Status Conference on April 27, 2022. The Parties reserve all of their arguments as to any deposition that may be noticed or any witness who may be selected.

Very truly yours,


ALEXANDRA S. BERNAY

cc: Counsel of Record (via ECF)